

1 Robert V. Prongay (SBN 270796)  
2 *rprongay@glancylaw.com*  
3 Charles Linehan (SBN 307439)  
4 *clinehan@glancylaw.com*  
5 Ex Kano S. Sams, II (SBN 192936)  
6 *esams@glancylaw.com*  
7 **GLANCY PRONGAY & MURRAY LLP**  
8 1925 Century Park East, Suite 2100  
9 Los Angeles, CA 90067  
10 Telephone: (310) 201-9150  
11 Facsimile: (310) 201-9160

12 *Attorneys for Lead Plaintiff Tad Park*

13  
14 **UNITED STATES DISTRICT COURT**  
15 **CENTRAL DISTRICT OF CALIFORNIA**

16 NAWSHEEN DUFFAYDAR,  
17 Individually and on behalf all others  
18 similarly situated,

19 Plaintiff,

20 v.

21 SONDER HOLDINGS INC., FRANCIS  
22 DAVIDSON, CHRIS BERRY, and  
23 DOMINIQUE BOURGAULT,

24 Defendants.

Case No. 2:24-cv-02952-SB (JCx)  
[c/w: 2:24-cv-04798-MWF (JCx)]

25 **STIPULATION REGARDING**  
26 **DISMISSAL**

1           Lead Plaintiff Tad Park (“Lead Plaintiff”) and Defendants Sonder Holdings  
2 Inc., Francis Davidson Chris Berry, and Dominique Bourgault (“Defendants” and,  
3 together with Lead Plaintiff, the “Parties”), through their respective counsel of  
4 record, hereby stipulate as follows:

5           WHEREAS, on August 27, 2025, the Court entered an Order Granting  
6 Defendants’ Motion to Dismiss the First Amended Complaint in this action (“Order”  
7 [Dkt. No. 61]);

8           WHEREAS, in the Order, the Court dismissed the First Amended Complaint,  
9 granted Lead Plaintiff leave to file a further amended complaint by September 8,  
10 2025 and stated, among other things, that if a further amended complaint is not filed  
11 by that date, Lead Plaintiff’s claims will be dismissed with prejudice;

12           WHEREAS, Lead Plaintiff has determined that he will not file an amended  
13 complaint;

14           WHEREAS, in light of the foregoing, the Parties agree that each of the Parties  
15 shall bear his or its own costs and attorneys’ fees, that no party will assert or contend  
16 that any of the Parties or their respective counsel have at any time failed to comply  
17 with Rule 11 of the Federal Rules of Civil Procedure, that no party will seek to  
18 recover fees or costs from any of the other Parties, and that no party will file an  
19 appeal from the Order or from any other order entered in this action;

20           WHEREAS, neither Lead Plaintiff nor his counsel is receiving any payment  
21 or other consideration from Defendants, and the Parties have not entered into any  
22 agreement except as expressly set forth in this Stipulation.

23           **IT IS SO STIPULATED.**

24           DATED: September 8, 2025

**GLANCY PRONGAY &  
MURRAY LLP**

By: /s/ Ex Kano S. Sams II

Robert V. Prongay

Charles H. Linehan

Ex Kano S. Sams II

1925 Century Park East, Suite 2100

Los Angeles, CA 90067  
Telephone: (310) 201-9150  
Facsimile: (310) 201-9160  
Email: info@glancylaw.com

*Attorney for Lead Plaintiff Tad Park*

DATED: September 8, 2025

**WILMER CUTLER PICKERING  
HALE AND DORR LLP**

By: /s/ Jessica Lewis

Jessica Lewis  
2600 El Camino Real, Suite 400  
Palo Alto, CA 94306  
Telephone: (650) 600- 5186  
Email:  
Jessica.Lewis@wilmerhale.com

*Attorney for Defendants*

**ATTESTATION OF CONCURRENCE IN FILING**

Pursuant to the United States District Court for the Central District of California's Civil L.R. 5-4.3.4(a)(2)(i), Ex Kano S. Sams II attests that concurrence in the filing of this document has been obtained from Jessica Lewis, counsel for Defendants.

Dated: September 8, 2025

By: /s/ Ex Kano S. Sams II

Ex Kano S. Sams II

**PROOF OF SERVICE BY ELECTRONIC POSTING**

I, the undersigned say:

I am not a party to the above case, and am over eighteen years old. On September 8, 2025, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Central District of California, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 8, 2025, at Los Angeles, California.

/s/ Ex Kano S. Sams II  
Ex Kano S. Sams II